

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04CV12627

STEPHEN D. CAIAZZO,

Plaintiff,

v.

THE MEDALLION INSURANCE
AGENCIES, INC.,
Defendant.

ASSENTED TO MOTION TO EXTEND SCHEDULING ORDER DEADLINES

NOW COME the defendant, The Medallion Insurance Agencies, Inc., in the above-captioned matter and moves that this Honorable Court extend the scheduling order deadlines by two months.

In support of this motion, the defendant state as follows:

1. This is a complicated matter involving three separate and distinct claims of the plaintiff against the defendant.

2. The deposition of the plaintiff has been taken and as a result additional depositions are being scheduled to be completed by the end of August 2005. The parties were unable to complete the remaining depositions within the July 1, 2005 fact discovery deadline due to scheduling conflicts and have agreed to cooperate in regard to the further depositions.

3. The parties are in the process of scheduling these depositions to be completed before the end of August.

4. Allowance of this motion will serve the interests of justice and judicial economy, insofar as no party will be prejudiced, and by allowing the parties to obtain information which they reasonably require to prepare for trial, and to narrow the areas of dispute for trial.

5. The plaintiff assented to this motion.

WHEREFORE, the defendant respectfully requests that the scheduling order be amended as follows:

- a) Fact discovery due by 9/1/05;
- b) Plaintiff to disclose expert by 9/15/05;
- c) Defendant to disclose expert by 10/15/05;
- d) Discovery due by 11/15/05;
- e) Motions due by 12/17/2005; and
- f) Response due by 1/17/05 (or 30 days after the motion is filed).

THE MEDALLION INSURANCE AGENCIES, INC.

By its attorneys,



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